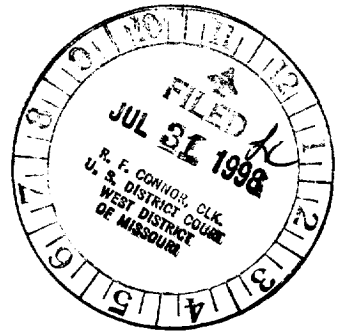


IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION



B. JEAN WEBB

Plaintiff,

vs.

CITY OF REPUBLIC, MISSOURI

Defendant.

No. 98-3306-CV-S-RGC

MOTION FOR RELIEF FROM ORDER  
WITH SUGGESTIONS IN SUPPORT

Defendant, pursuant to Rule 60 (b) of the Fed. R. Civ. P., hereby moves for relief from this Court's Order, dated July 27, 1998, granting Plaintiff's "Motion to Amend Complaint with Suggestions in Support", and would respectfully show this Court as follows:

Suggestions in Support

1. Under Rule 13 of the local rules of this Court, a non-moving party has twelve (12) days from the date a motion is filed in which to file a response thereto, with suggestions in opposition.

2. Defendant opposes Plaintiff's "Motion to Amend Complaint" for various reasons, as will be set forth in Defendant's "Response to Plaintiff's Motion to Amend Complaint With Suggestions in Opposition", to be filed pending approval of the Court.

3. This Court's Order of July 27, 1998, entered prior to the expiration of the aforementioned twelve-day period, precluded Defendant filing its "Response to Plaintiff's Motion to Amend Complaint" before the Court's Order was issued, and Defendant has therefore not had an opportunity to present its suggestions in opposition to Plaintiff's motion to amend.

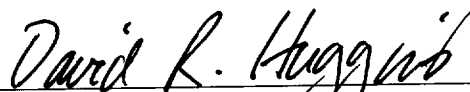
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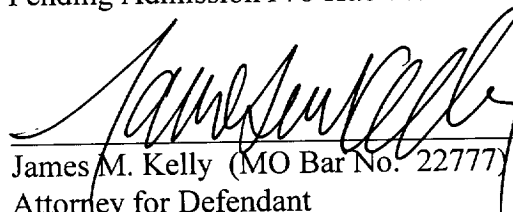
WHEREFORE, Defendant respectfully requests that this Court grant Defendant relief from its Order of July 27, 1998, permit Defendant to file its "Response to Plaintiff's Motion to Amend Complaint with Suggestions in Opposition", and reconsider its decision as to Plaintiff's "Motion to Amend Complaint" in light of Defendant's response.

Respectfully submitted,

THE NATIONAL LEGAL FOUNDATION  
Attorneys for Defendant  
P.O. Box 341283  
Memphis, Tennessee 38184-1283  
(901) 385-2118



David R. Huggins (TN Bar No. 014901)  
Pending Admission *Pro Hac Vice*



James M. Kelly (MO Bar No. 22777)  
Attorney for Defendant  
316 West Highway 60  
P.O. Box 327  
Republic, Missouri 65738  
(417) 732-8800

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon Stephen Douglas Bonney, Esq., counsel for Plaintiff, 215 West 18th Street, Kansas City, MO 64108, via U.S. Mail, postage prepaid, on this the 30<sup>th</sup> day of July, 1998.

